

1 The Honorable J. Kelley Arnold  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

9 PAMELA K. FITZSIMMONS, )  
10 )  
11 Plaintiff, ) No. C05-5321JKA  
12 v. )  
13 ) STIPULATION FOR AND ORDER OF  
14 THE COLUMBIAN PUBLISHING ) DISMISSAL OF ALL CLAIMS WITH  
COMPANY dba THE COLUMBIAN, ) PREJUDICE AND WITHOUT COSTS  
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26 )  
Defendant. )  
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**STIPULATION**

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the undersigned parties, that all claims by and between plaintiff PAMELA K. FITZSIMMONS and defendant THE COLUMBIAN PUBLISHING COMPANY dba THE COLUMBIAN, have been fully compromised and settled and that any and all claims in this lawsuit between those parties

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STIPULATION FOR AND ORDER OF DISMISSAL OF ALL  
CLAIMS WITH PREJUDICE AND WITHOUT COSTS - 1  
Case No. 05-5321JKA

BARRAN LIEBMAN LLP  
601 SW SECOND AVENUE, SUITE 2300  
PORTLAND, OR 97204-3159  
PHONE (503) 228-0500 FAX (503) 274-1212

1 may now be dismissed with prejudice and without costs or fees to any party.

2 This motion is supported by the accompanying Declaration of Edwin A. Harnden.

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4 IT IS SO STIPULATED:

5 ALTSCHUL LAW OFFICE, PC

BARRAN LIEBMAN LLP

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7 By: /s/  
8 Andrew Altschul, WSBA No. 32025

9 Attorney for Plaintiff

10 Dated: March 7, 2006

By: /s/  
Edwin A. Harnden, WSBA No. 32478  
Brenda K. Baumgart, OSB No. 99216  
*Pro Hac Vice*  
Of Attorneys for Defendant

Dated: March 7, 2006

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STIPULATION FOR AND ORDER OF DISMISSAL OF  
ALL CLAIMS WITH PREJUDICE AND WITHOUT  
COSTS - 2

Case No. 05-5321JKA

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## **ORDER**

THIS MATTER having come before the above-entitled Court upon the foregoing Stipulation of the Parties, and the Court having reviewed the foregoing stipulation, and deeming itself fully advised, it is now, therefore, hereby

ORDERED, ADJUDGED, AND DECREED as follows:

(1) The foregoing Stipulation of the parties for the dismissal of the claims by and between plaintiff PAMELA K. FITZSIMMONS and defendant THE COLUMBIAN PUBLISHING COMPANY dba THE COLUMBIAN with prejudice and without costs, is hereby GRANTED.

(2) Any and all claims by and between PAMELA K. FITZSIMMONS and defendant THE COLUMBIAN PUBLISHING COMPANY dba THE COLUMBIAN, arising out of the subject matter of this litigation, whether or not asserted in this matter, are hereby dismissed with prejudice and without costs or fees to any party.

DONE IN OPEN COURT this 8<sup>th</sup> day of March, 2006.

/s/ J. Kelley Arnold  
United States Magistrate Judge

STIPULATION FOR AND ORDER OF DISMISSAL OF ALL  
CLAIMS WITH PREJUDICE AND WITHOUT COSTS - 3  
Case No. 05-5321JKA

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1 Presented By:

2 BARRAN LIEBMAN LLP

3  
4 By /s/ Edwin A. Harnden  
5 Edwin A. Harnden, WSBA No. 32478  
6 Brenda K. Baumgart, OSB No. 99216  
7 *Pro Hac Vice*  
8 Attorneys for Defendant  
9 The Columbian Publishing Company

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STIPULATION FOR AND ORDER OF DISMISSAL OF  
ALL CLAIMS WITH PREJUDICE AND WITHOUT  
COSTS - 4

Case No. 05-5321JKA  
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## **CERTIFICATE OF SERVICE**

I, Brenda K. Baumgart, certify under penalty of perjury under the laws of the State of Washington that, on the 7<sup>th</sup> day of March, 2006 I caused to be served on the person listed below in the manner shown:

**STIPULATION FOR AND ORDER OF DISMISSAL OF ALL CLAIMS WITH  
PREJUDICE AND WITHOUT COSTS**

**Andrew Altschul**  
ALTSCHUL LAW OFFICE, PC  
117 SW Taylor Street, Suite 200  
Portland, OR 97204

### Attorneys for Plaintiff

By causing the same to be:  emailed  hand delivered  faxed to them at true and correct copy thereof.

By /s/ Edwin A. Harnden  
Edwin A. Harnden, WSBA No. 32478  
Brenda K. Baumgart, OSB No. 99216  
*Pro Hac Vice*  
Attorneys for Defendant The Columbian  
Publishing Company